

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**IN RE: BLUE CROSS BLUE SHIELD  
ANTITRUST LITIGATION  
(MDL No. 2406)**

**Master File No. 2:13-CV-20000-RDP**

**This document relates to Subscriber-Track cases.**

**DECLARATION OF B. PARKER MILLER IN SUPPORT OF WELLS FARGO'S  
UNOPPOSED MOTION TO WITHDRAW REQUEST FOR EXCLUSION  
AND REJOIN THE SUBSCRIBER DAMAGES CLASS**

I, B. Parker Miller, declare under oath, that:

1. Wells Fargo & Company and the Wells Fargo & Company Health Plan (for Eligible Active Employees and Their Dependents) (collectively, "Wells Fargo") wish to withdraw its request for exclusion from the Subscriber Settlement Damages Class ("Damages Class"). Wells Fargo expects that if the Motion to Withdraw is granted, Wells Fargo would maintain the same rights and obligations as other class members.

2. On April 28, 2022, Wells Fargo submitted a request to be excluded from the Damages Class (Exhibit A, attached here). After the Court issued the Final Order and Judgment Granting Approval of Subscriber Class Action Settlement and Appointing Settlement Administrator ("Final Approval Order"), ECF No. 2931; *see also* ECF No. 2939 (amending Final Approval Order), Wells Fargo re-considered its position and now desires to rejoin the Damages Class.

3. Wells Fargo has not entered into any other settlements, releases, or agreements resolving Wells Fargo's claims in the *In re: Blue Cross Blue Shield Antitrust Litigation* with any Defendant in this litigation.

4. To the best of my knowledge, Settlement Class Counsel and Defendants to do not oppose the Motion to Withdraw.

I certify under penalty of perjury that the forgoing is true and correct to the best of my knowledge. Executed this 2nd day of December, 2022 in Atlanta, Georgia.

/s/ B. Parker Miller  
B. Parker Miller